TORKILDSON, KATZ, HETHERINGTON, HARRIS & KNOREK Attorneys at Law, A Law Corporation

KENDRA K. KAWAI 7779

(kkk@torkildson.com)

JOSEPH A. ERNST 9001

(jae@torkildson.com)

JENNIFER L. GITTER 10503

(jlg@torkildson.com)

700 Bishop Street, 15th Floor

Honolulu, HI 96813-4187

Telephone: (808) 523-6000 Facsimile: (808) 523-6001

Attorneys for Defendant

ARMSTRONG PRODUCE, LTD.

IN THE UNITED STATES DISTRICT COURT

FOR THE DISTRICT OF HAWAII

BUDDY P. KAMAKEEAINA,

v.

ARMSTRONG PRODUCE, LTD.,

Plaintiff,

Defendant.

CIVIL NO. 19-00158 DKW-RT

DEFENDANT ARMSTRONG
PRODUCE, LTD.'S MOTION TO
CONSOLIDATE RELATED
ACTIONS; MEMORANDUM IN
SUPPORT OF MOTION;
DECLARATION OF KENDRA K.
KAWAI; EXHIBIT A;
CERTIFICATE OF SERVICE

DEFENDANT ARMSTRONG PRODUCE, LTD.'S MOTION TO CONSOLIDATE RELATED ACTIONS

Defendant Armstrong Produce, Ltd. hereby moves to consolidate this case with *Buddy P. Kamakeeaina v. Armstrong Produce, Ltd.*, Case No. 18-00480

DKW-RT for all purposes, including all pretrial matters and for trial. The plaintiff and defendant in the two cases are the same, and the claims arise out of the same operative facts. Consolidation will expedite the proceedings, avoid unnecessary delays and eliminate the risk of inconsistent adjudications.

This motion is made pursuant to FRCP 42(a), Local Rules 7.1 and 7.2 of the Local Rules of Practice for the United States District Court for the District of Hawaii, the attached memorandum and declaration of counsel, and the complete files of this action and the related action.

DATED: Honolulu, Hawai'i, April 5, 2019.

TORKILDSON, KATZ, HETHERINGTON, HARRIS & KNOREK Attorneys at Law, A Law Corporation

/s/ Kendra K. Kawai

KENDRA K. KAWAI JOSEPH A. ERNST JENNIFER L. GITTER Attorneys for Defendant ARMSTRONG PRODUCE, LTD.

17401/0015/2419871.V1